providing a software object that responds to spoken and non-spoken command information to implement the same command; and

firing the same event when said object receives spoken and non-spoken command information.

(New) An article comprising a medium storing instructions that enable a computer to:

provide a software object that responds to spoken and non-spoken command information to implement the same command; and

fire the same event when said object receives spoken and non-spoken command information.

REMARKS

Claims 21-24

New claims 21-24 were rejected over the Hashimoto patent under § 103. It is respectfully submitted there is absolutely nothing in the over one hundred pages of figures and extensive specification of Hashimoto which ever contemplated (much less showed) an embodiment in which the same identifier was used for both spoken and non-spoken commands. The whole sense of Hashimoto from beginning to end is to replace non-spoken command input devices (such as a mouse) with spoken command systems.

The Examiner relies on more than one embodiment of Hashimoto to reject claim 21. Referring to the eighteenth embodiment (which begins with Figure 96 and column 58, line 66), the whole point of this embodiment is to cause the system to accept spoken commands and to allow those spoken commands to drive applications which are not adapted to respond to spoken commands. Nothing in Hashimoto ever suggests receiving non-spoken input commands and having a software object handle those

commands. Instead, the whole point of Hashimoto's embodiment is to convert the spoken commands to a format that will be recognized by an application that only handles non-spoken input commands.

The figures never show a non-spoken input command. Moreover, the text makes it clear that only spoken commands are responded to. The GAP 103 receives the decoded spoken command and converts it into a format compatible with applications that do not normally handle spoken commands. The GAP 103 is never connected to any kind of non-spoken input. Referring to Figure 96, the only input the GAP 103 gets is from the message conversion unit 143 which receives the translated spoken message. See column 60, lines 7-12. This embodiment does not teach the claimed invention since the GAP only gets spoken inputs. The fact that the GAP converts those inputs into a format which is perceived to be identical to that of other conventional input means is totally irrelevant to the claimed invention.

Claim 21 calls for "associating a spoken and a non-spoken command with the same identifier". Certainly, there is nothing to suggest that Hashimoto uses identifiers. Even if he did, there is absolutely no mention of any kind of system in which the same identifier is associated with both spoken and non-spoken commands. If that were not enough, the identifier is not associated "with an action to be taken in response to either the spoken or non-spoken command". Hashimoto's idea was to get rid of conventional inputs and to replace them with spoken inputs.

Even if Hashimoto's software programs could respond to both spoken and non-spoken input commands, no identifier is utilized to allow the same software to handle both spoken and non-spoken commands. Instead, separate software systems must be provided to handle each type of command. This may be undesirable for a

number of reasons including the possibility of contention between those separate systems.

The office action also relies on the first embodiment set forth in Hashimoto. How bits and pieces from distinct embodiments can be combined is not clear. But even if every one of the multitude of embodiments were combined, a *prima facie* rejection of claim 21 based on Hashimoto can not be made out.

The cited material in Hashimoto's column 18 (with respect to the first embodiment) merely states that "the speech input can be provided as the data input means for all the application programs just as the other data input means such as the keyboard and mouse." This is again the same idea that the speech can be received to provide a command input to replace commands normally received by other input means. This in no way suggests that common software modules may be utilized to receive both spoken and non-spoken commands. Instead, it suggests replacing non-spoken inputs with spoken inputs, which teaches away from the claimed invention.

In view of these remarks, reconsideration of the rejection of claims 21-24 is respectfully requested.

Claims 14, 31 and 32

Reconsideration of the § 102 rejection based on Trower is respectfully requested. Trower nowhere teaches that the same object may receive both spoken and non-spoken commands. To the contrary, Trower is explicit that one sets whether or not a given object receives a spoken or non-spoken command by setting the voice property for a command. See column 27, lines 25-26. Thus, Trower never contemplated having the same object respond to both spoken and non-spoken commands.

Furthermore, new independent claims 31 and 32 call for an object that receives both spoken and non-spoken commands for the

same task and fires the same event for either spoken or non-spoken commands. Thus, claims 14, 31 and 32 and the claims dependent thereon patentably distinguish over Trower.

With respect to the rejection of claim 14 under Andreshak, the Examiner (in his additional comments) insists that Andreshak teaches a response to either tactile or spoken user inputs by a speech recognition object. This simply is not the case and to date the Examiner has never pointed out any location in Andreshak where the same object is utilized for both spoken and non-spoken commands. Similarly, with respect to new claims 31 and 32, Andreshak does not teach an object which responds to both spoken and non-spoken commands and generates the same event when a spoken or non-spoken command is provided.

Therefore, reconsideration of the rejection under § 102 based on Andreshak is respectfully requested.

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In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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